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*Attorneys for Plaintiff/Counterdefendants  
TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,  
and Rowen Seibel*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TPOV ENTERPRISES 16, LLC, a Delaware limited liability company,

Case No. 2:17-cv-00346-JCM-VCF

Plaintiff,  
vs.

PARIS LAS VEGAS OPERATING COMPANY,  
LLC, a Nevada limited liability company,

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR OBJECTION  
TO REPORT AND RECOMMENDATION  
AND ORDER [ECF No. 194]**

**Defendant.**

PARIS LAS VEGAS OPERATING COMPANY,  
LLC, a Nevada limited liability company,

**(FIRST REQUEST)**

**Counterclaimant,**  
**vs.**

TPOV ENTERPRISES, LLC, a Delaware limited liability company, TPOV ENTERPRISES 16, LLC, a Delaware limited liability company, ROWEN SEIBEL, an individual,

#### **Counterdefendants.**

Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC (“TPOV 16”); Counterdefendant TPOV Enterprises, LLC (“TPOV”); Counterdefendant Rowen Seibel (“Seibel”); and Defendant/Counterclaimant Paris Las Vegas Operating Company, LLC (“Paris”) (collectively, the “Parties”) stipulate and agree as follows:

1. On October 15, 2019, Paris filed a Motion for Terminating Sanctions, seeking case-  
terminating sanctions against TPOV 16, TPOV, and Seibel. (ECF Nos. 152 and 153.)

2. On February 19, 2020, United States Magistrate Judge Cam Ferenbach entered a Report and Recommendation and Order (the “Report and Recommendation”). (ECF No. 194.)

3. In the Report and Recommendation, the Magistrate Judge recommended that Paris’ Motion for Terminating Sanctions be granted, in part; specifically, recommending that the Answer filed by TPOV 16, TPOV, and Seibel (ECF No. 40) be stricken as to TPOV only (i.e., not as to TPOV 16 and Seibel). (ECF No. 194, at 13:5-8.)

4. On March 2, 2020, TPOV 16, TPOV, and Seibel filed a motion seeking to replace their counsel with the law firm of Bailey♦Kennedy. (ECF No. 195.) That afternoon, the Court granted TPOV 16, TPOV, and Seibel’s application for Bailey♦Kennedy to substitute in as their counsel. (ECF No. 196.)

5. Currently, the deadline to file an objection to the Report and Recommendation is tomorrow, March 4, 2020. *See* LR IB 3-2(a).

6. The deadline to file an objection to the Report and Recommendation shall be extended by seven (7) days to March 11, 2020.

7. Good cause exists to extend the deadline to file an objection to the Report and Recommendation to March 11, 2020. Recently engaged counsel for TPOV 16, TPOV, and Seibel needs sufficient time to acclimate themselves with the matter (including the issues related to the Motion for Terminating Sanctions) in order to submit an objection to the Report and Recommendations, which, from their perspective, is particularly true given that the Magistrate Judge’s recommended sanction is a case-terminating sanction as to TPOV.

1        8. This is the first request to extend time, is made in good faith, and will not impact any  
2 other deadlines.

3        Dated this 3<sup>rd</sup> day of March, 2020.

4        BAILEY♦KENNEDY

5        By: /s/ Paul C. Williams

6            JOHN R. BAILEY  
7            DENNIS L. KENNEDY  
8            JOSHUA P. GILMORE  
9            PAUL C. WILLIAMS  
10          STEPHANIE J. GLANTZ

11        *Attorneys for Plaintiff/Counterdefendants*  
12        *TPOV Enterprises, LLC, TPOV Enterprises*  
13        *16, LLC, and Rowen Seibel*

Dated this 3<sup>rd</sup> day of March, 2020.

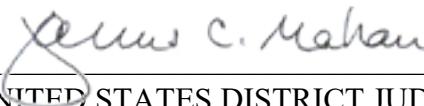
PISANELLI BICE PLLC

By: /s/ M. Magali Mercera

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14        *Attorneys for Defendant/Counterclaimant*  
15        *Paris Las Vegas Operating Company, LLC*

16        IT IS SO ORDERED.

17          
UNITED STATES DISTRICT JUDGE

18        DATED: March 4, 2020

19        Respectfully submitted by:

20        BAILEY♦KENNEDY

21        By: /s/ Paul C. Williams

22            JOHN R. BAILEY  
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